



THE RAILWAY ASSOCIATION OF CANADA
L'ASSOCIATION DES CHEMINS DE FER DU CANADA



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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Dear **Ms.** Dortch:

Subject: Opposition to ITA Petition (RM No. 10687)

The Railway Association of Canada ("RAC") hereby registers its opposition to the petition of the Industrial Telecommunications Association ("ITA") to become a certified frequency coordinator for railroad mobile radio channels in the United States.

RAC's members consist of the freight, commuter, tourist and intercity railways of Canada. In addition to representing its members in policy development and advocacy before governmental bodies, RAC serves as the exclusive frequency coordinator for the land mobile radio spectrum allocated and licensed by Industry Canada for use by the Canadian railroads.

Due to extensive near-border and cross-border traffic and operations, the mobile radio systems of railroads in the United States and Canada are essentially interoperable. In this regard, the U.S. and Canadian railroads share a common frequency plan for land mobile radio channels at 160 MHz, 450 MHz and 900 MHz, with RAC and the Association of American Railroads ("AAR") each performing the frequency coordination function for channels used, respectively, in Canada and the United States.

There are two reasons why RAC opposes the proposal of ITA to open up the railroad frequency coordination function in the U.S. to multiple coordinators. First, it would unnecessarily complicate and impede the consultative process for near-border and through-service applications. Historically, the frequency coordinators at RAC and AAR have engaged in regular and routine consultation with each other on applications of common concern. This close consultative relationship has resulted in timely and efficient coordination decisions and effective resolution of potential conflicts. These benefits are attributable in large measure to the fact that the frequency coordinators at RAC and AAR are knowledgeable about the unique operational requirements of the railroad industry. These benefits would be lost if the RAC were required to deal with a multiplicity of frequency coordinators in the U.S., especially if eligibility were opened up to U.S. frequency coordinators with no knowledge, expertise or experience in railroad operations.

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Second, it would inhibit significantly the ability of Canadian and U.S. railroads to accomplish cohesive and orderly migration to narrowband channelization as envisioned by the FCC in its "refarming" decision and by Industry Canada in its comparable proceeding involving rechannelization of the land mobile bands in Canada. This will be a long, gradual migration by railroads on both sides of the border, and will require close and careful frequency coordination for railroad radio users in Canada and the United States, as explained below.

The migration to narrowband (12.5 kHz channel width) contemplated by Industry Canada and the FCC envisaged a fairly simple replacement of wideband radios with narrowband units. Although that conversion method may be practical for users having a relatively small number of radio units operating in a limited geographic area, it is not workable for railways, which have a very large radio inventory that must be changed without affecting existing train operations that are supported by the rail industry's nationwide mobile radio networks in Canada and the U.S. Because the quantity of radio equipment in the rail industry (both base stations and mobile units) is so vast, the conversion necessarily will be gradual, which means that wideband and narrowband radios will be intermixed during the lengthy period of time required to complete the conversion.

During the transition, careful frequency coordination will be extremely important because of the potential interaction of adjacent narrowband and wideband radio systems and the consequent risk of destructive interference to ongoing operations. In other words, the common Canadian-U.S. channel plan will require that railroad communications engineers and planners in both countries work closely together in implementing the migration to narrowband.

RAC strongly believes the migration can be successful in both countries only if there is a single point of contact on each side regarding the frequency assignment plan during the transition. In this regard, RAC's Class 1 freight railroad members (Canadian National and Canadian Pacific) also are members of AAR, and for some time RAC has been working with AAR on overall frequency planning for the narrowband conversion and migration, starting in the early 1990s with the joint "North American Railroad Radio Network" ("NARRN") project, and more recently as a participant in AAR's Wireless Communications Task Force ("WCTF"). This relationship has thus far worked very well. But if multiple frequency coordinators were to be inserted into the equation on the U.S. side of the border, the process of planning and implementing the migration would become unduly complex and unmanageable, and RAC's effectiveness in implementing narrowband conversion in Canada would be seriously jeopardized.

Thank you for providing RAC the opportunity to express its views in this proceeding.

Sincerely,

A handwritten signature in black ink, appearing to be "W.A. Rowat", written over a horizontal line.

W.A. Rowat
President and Chief Executive Officer

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cc: Mr. Jeremy Denton
Industrial Telecommunications Assoc.
1110N. Glebe Road, Suite 500
Arlington, VA 22201

cc: Mr. Allan Rock
Minister of Industry Canada
Ottawa, Canada
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